K070433

LERADO CHINA LIMITED
No. 22, Kuang Fu Road, Chia Tai Industrial Tai Pao City,
Chia Yi Hsien, Taiwan, ROC
Tel: 886-5-2475629 Fax: 886-5-2379672
E-mail:edwardk@lerado.com.tw http:// www.lerado.com

MAR 16 2007

" 510(k) SUMMARY "

Submitter's Name: ***Lerado China Limited***

No. 22, Kuang Fu Road, Chia Tai Industrial,Tai Pao City, Chia Yi Hsien, 612, Taiwan, ROC

Date summary prepared: February 5, 2007

Device Name:

Proprietary Name:	LERADO Power Wheelchair, PB
Common or Usual Name:	Powered Wheelchair
Classification Name:	Powered Wheelchair, Class II, 21 CFR 890.3860

Indications for Use:

The device is intended for medical purposes to provide mobility to persons restricted to a seated position.

Description of the device:

The LERADO Power Wheelchair, PB is an indoor / outdoor Powered Wheelchair that is battery operated. It has a base with four-wheeled with a seat. The movement of the Wheelchair is controlled by the rider who uses hand controls located at the top of the steering column. The device can be disassembled for transport and is provided with an onboard battery charger.

Performance Testing:

EMC Report ANSI / RESNA WC/Vol.2-1998, CISPR 11: 1990, EN61000-3-2: 1995, IEC61000-3-3: 1995 (Electrically Powered Wheelchairs, controller, and their chargers – requirements and test methods)

Legally marketed device for substantial equivalence comparison:

WU'S Powered Wheelchair, MAMBO 36X **(K050010)**

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C.2 COMPARISON SUMMARY

(We place the related information for the predicate device in the following pages.)

We can know from the above table that the intended use between the two devices is the same. Mainframes of two devices are not foldable and all meet the strength and fatigue tests, thus they are similar for the material aspects. The overall dimensions are similar. The weight capabilities, maximum speed, suspension of cross brace, footplates, armrest, and the warranty are all the same. Back upholstery material is also the same fabric.

Especially the electronic systems between two devices are the same suppliers, and all passed by the UL certificated, for instance the motor, batteries, and recharge. Though for the electronic controller, the predicate used by Penny & Giles and the subject device used by Dynamic DA series that are also passed by the UL certificated. Thus the same safety level for the two devices is assured.

There is different incline capability for the two devices. The new device can drive under 10 degrees and the predicate device claim 5 degrees slope. We place the specification limit of 10 degrees in the page 2 of the Owner's Manual. Thus, the user is not allowed to operate the device on the incline angle higher than the specified angle. The safety levels of the two devices are the same when operating the devices on the different inclines. They are substantially equivalent.

The cruising range per charge is different, the new device is 22.5 miles and 15 miles for the predicate device. Certainly the real range depends on the practical environments, i.e., weight, surface, incline, and temperature. For the real life use, the two devices are substantially equivalent.

To sum up, **the major differences existing are the overall dimensions, cruising range, and the incline degrees are differences between the two devices**. The overall appearance differences are not safety aspect. So the new device is substantially equivalent to the predicate devices in this aspect.

Based on the above the information and the analysis, we know that the subject device and the predicate device have the same intended use the same technological aspects and only minor dimensions and material differences exist. We believe that FDA can decide the subject device and the predicate device are substantially equivalent.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

Lerado China Limited
% Dr. Ke-Min Jen
Official Correspondent
No. 58, Fu-Chiun St.
Hsin-Chu City, 30067
Taiwan, Republic of China

MAR 16 2007

Re: K070433
Trade/Device Name: Lerado Power Wheelchair, PB
Regulation Number: 21 CFR 890.3860
Regulation Name: Powered wheelchair
Regulatory Class: Class II
Product Code: ITI
Dated: February 5, 2007
Received: February 14, 2007

Dear Dr. Jen:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0120 . Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Mark N. Melkerson
Director
Division of General, Restorative
and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Indications for Use

510 (K) Number (If Known): K

Device Name: *LERADO, Power Wheelchair, PB*

Indications for Use:

The device is intended for medical purposes to provide mobility to persons restricted to a sitting position.

Prescription Use _____ AND/OR Over-The-Counter Use √

(Part 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)
Division of General, Restorative, and Neurological Devices

510(k) Number k070433